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NAIM R. COSTANDI

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

NAIM R. COSTANDI	)	Case No.: 2:17-cv-02019-JCM-PA
	)	
Plaintiff,	)	UNOPPOSED MOTION TO EXTEND
v.	)	TIME TO FILE MOTION FOR
	)	REVERSAL AND/OR REMAND
NANCY A. BERRYHILL,	)	
Acting Commissioner of Social	)	(SECOND REQUEST)
Security,	)	
	)	
Defendant.	)	

Plaintiff Naim R. Costandi respectfully requests that the Court extend the time for Plaintiff to file her Motion for Reversal and/or Remand by 35 days from July 12, 2018 to August 16, 107, with all other dates in the Court's Order Concerning Review Of Social Security Cases extended accordingly. Of Counsel for Plaintiff has conferred with Defendant's counsel, who has no opposition to this motion, on July 12, 2018.

1 This is Plaintiff's second request for an extension. As the Court may be  
2 aware of Plaintiff's Of Counsel situation with other Social Security cases, Of  
3 Counsel's mother has been fighting a losing battle with Systemic Lupus  
4 Erythematosus that has required multiple surgeries these past two years due  
5 inflammation affecting the kidneys and lungs.

6 On February 6, 2018, Of Counsel's mother was taken to the emergency  
7 room and was admitted to the hospital.

8 On February 8, 2018, Of Counsel's mother had a surgery to avoid further  
9 kidney obstruction due to the Lupus inflammation and kidney infection.

10 On February 16, 2018, Of Counsel's husband's mother suffered two  
11 ischemic strokes, requiring 24-hour daily care for her activities of daily living up to  
12 present day, which Counsel has had to assist with.

13 On March 28, 2018, Of Counsel's mother was advised that another kidney  
14 surgery was medically necessary.

15 After consultations with different specialists during the month of April, on  
16 May 8, 2018, Of Counsel's mother had an out-patient procedure to her kidney to  
17 test if surgery was an option.

18 On May 25, 2018, Of Counsel's mother was informed that the kidney  
19 infection is not curable, and that she is required to have at least three kidney  
20 surgeries or be placed on antibiotics for as long as her body could handle it. Due to  
21 the autoimmune disease, the latter is simply not an option.

22 On June 7, 2018 at 3:30 a.m., Of Counsel's husband suffered a micturition  
23 syncope resulting in a concussion, 17 staples to his head, and a blood transfusion.  
24 Counsel was in the hospital with her husband had to provide care for her husband  
25 for 24-hour watch due to the concussion.

26

1 Of Counsel's mother has the first of three kidney surgeries scheduled on  
2 July 17, 2018. Counsel needs to take additional time to place all her mother's  
3 personal and financial matters in order.

4 This is not an ordinary circumstance for Of Counsel and Of Counsel  
5 sincerely apologizes to the Court for any inconvenience this may have cause.  
6 Counsel's firm has hired another associate to help Counsel during this difficult  
7 time.

8 DATE: July 12, 2018

Respectfully submitted,

9 LAWRENCE D. ROHLFING

10 /s/ *Cyrus Safa*

11 BY: \_\_\_\_\_

Cyrus Safa

Attorney for plaintiff Mr. Naim R. Costandi

12 Of Counsel:

13 Monica Perales

14 Attorney at Law

15  
16 DATED: July 19, 2018

17 IT IS SO ORDERED:



18 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE  
FOR CASE NUMBER 2:17-CV-02019-JCM-PA**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on July 12, 2018.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

*/s/ Monica Perales*

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Monica Perales  
Attorneys for Plaintiff